REMARKS

Applicants respectfully request further examination and reconsideration in view of the above amendments and the arguments set forth fully below. In the Office Action mailed September 5, 2003, claims 1-31 and 33-44 have been rejected and claim 32 has been objected to. In response, the Applicants have amended claim 26, canceled claims 30-32 and submitted the following remarks. Accordingly, claims 1-29 and 33-44 are pending. Favorable reconsideration is respectfully requested in view of the above amendments and the remarks below.

Rejections Under 35 U.S.C. § 102(e)

Claims 1, 10 and 26 stand rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent No. 5,982,418 to Ely (hereinafter Ely). In particular, it is asserted within the Office Action that claims 1, 10 and 26 are anticipated in that Ely discloses an apparatus/method for receiving video signals from video cameras, comprising a selector having a plurality of inputs wherein each input receives one of a plurality of video signals, a video decoder coupled to an output of the selector for receiving a selected one of the plurality of video signals and a controller coupled to the video decoder for conditioning the video decoder according to a parameter. Applicants respectfully traverse this rejection and submit that Ely does not teach a controller coupled to the video decoder for conditioning the video decoder according to a parameter. Furthermore, Applicants submit that Ely does not teach a video decoder coupled to **an output of** the selector.

It is asserted within the *Response to Remarks* of the Office Action that Ely discloses a controller (104) coupled to the video decoder (118) for conditioning the video decoder according to a plurality of parameters (command signals) representative of the selected one of the video signals (col. 9, lines 6-15), by considering command signals as meeting the recited claim limitation 'parameters.' Applicants respectfully disagree and resubmit the following arguments.

Ely discloses a video surveillance system including a central control station and a plurality of video cameras each mounted inside a dome housing unit. A video data buffer memory, storing compressed video data generated by the camera, is mounted with each camera in the respective dome unit. Data buffered at the dome units may be selectively protected from overwriting in response to alarm signals and then retrieved for display or tape-recording by the

central control station. Both live and buffered video signals are transmitted in compressed form over a data network that is also used for command, alarm and status messaging. [Ely, Abstract]

However, Ely does not teach a controller coupled to the video decoder for conditioning the video decoder according to a parameter. In fact, Ely teaches a video surveillance system having a decoder that is conditioned to receive commands from the Host, where the Host provides instruction to the Decoder in response to which the Decoder decodes and processes video data transmitted by the camera. [Ely, column 9, lines 6-11] Ely further states that a routing connection is made via this instruction to the receiving device rather than via an instruction to the sending device. [Ely, column 9, lines 11-15]

Ely also does not teach a selector having a plurality of **inputs** as well as a video decoder coupled to **an output of the selector**. Even if components 104 and 112 of Figure 2 in Ely are construed to be a selector (which they are not), as is asserted within the Office Action, then the selector is coupled to both the inputs (114) and the video decoders (118) at both the input side or the output side of the selector, not as claimed in the present invention where the inputs are received by an input of the selector and the video decoder is coupled to an output of the selector.

In contrast to the teachings of Ely, the apparatus and method of receiving video signals from video cameras of the present invention includes video cameras each coupled to provide a video signal to a respective input of a multiplexer. The multiplexer routes a selected one of the video signals to a video decoder. The video decoder receives the selected video signal and is conditioned according to the video signal. This includes synchronizing the video decoder to a frequency and phase of the video signal, controlling a gain level for the video signal and adjusting a dc clamping level for dc restoration of the video signal. Parameters representative of each of these quantities are stored in association with the identity of the corresponding video camera. The video decoder also places each video signal into a format suitable for storage in a storage device and for display by a display device. As the multiplexer is utilized to cycle through the cameras according to a sequence, the parameters for each camera are retrieved and utilized to initialize the video decoder for decoding the video signal received from the corresponding camera. As a result, the amount of time required to condition the video decoder according to the video signal received from each camera is significantly reduced. [Abstract of the Present Invention] The present invention thereby teaches an apparatus and method having a controller that conditions the decoder to receive inputs from a plurality of cameras **according to a parameter**. However, the controller provides instruction to the Multiplexer, not the decoder. As

described above, Ely does not teach a controller coupled to the video decoder for conditioning the video decoder according to a parameter.

The independent claim 1 is directed to an apparatus for receiving video signals from a plurality of video cameras. The apparatus of claim 1 includes a selector having a plurality of inputs wherein each input receives one of a plurality of video signals, a video decoder coupled to an output of the selector wherein the video decoder receives a selected one of the plurality of video signals and a controller coupled to the video decoder wherein the controller conditions the video decoder according to a parameter representative of the selected one of the video signals. As described above, Ely does not teach a controller coupled to the video decoder wherein the controller conditions the video decoder according to a parameter representative of the selected one of the video signals. Furthermore, Ely does not teach a selector having a plurality of inputs and a video decoder coupled to an output of the selector. For at least these reasons, the independent claim 1 is allowable over the teachings of Ely.

The independent claim 10 is directed to an apparatus for receiving video signals from a plurality of video cameras. The apparatus of claim 10 includes a selector having a plurality of inputs wherein each input receives one of a plurality of video signals, a video decoder coupled to an output of the selector wherein the video decoder receives a selected one of the plurality of video signals and a controller coupled to the video decoder wherein the controller conditions the video decoder according to a plurality of parameters representative of the selected one of the video signals. As described above, Ely does not teach a controller coupled to the video decoder wherein the controller conditions the video decoder according to a plurality of parameters representative of the selected one of the video signals. Furthermore, Ely does not teach a selector receiving a plurality of inputs and a video decoder coupled to an output of the selector. For at least these reasons, the independent claim 10 is allowable over the teachings of Ely.

The independent claim 26 is directed to a method of receiving video signals from a plurality of video cameras. The method of claim 26 has been amended to include selecting one of the plurality of video cameras for providing a video signal to a video decoder, retrieving a parameter representative of the video signal from a memory store, conditioning the video decoder according to the parameter and updating the parameter according to the video signal thereby forming an updated parameter and a predicted value for the parameter, wherein forming the predicted value for the parameter includes calculating a difference between prior value obtained for the parameter and a current value obtained for the parameter and combining the difference with the current value. Within the Office Action, claim 32 has been objected to as

being dependent upon a rejected base claim 26, but would be allowable: if claim 32 were rewritten in independent form including all of the limitations of the base claim 26 and any intervening claims. The Applicants have amended claim 26 to include the limitations of claims 30-32, i.e., all intervening claims. For at least these reasons, the independent claim 26 is allowable over the teachings of Ely.

Claims 2-3 and 11-12 stand rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent No. 5,982,418 to Ely (hereinafter Ely). In particular, it is asserted within the Office Action that claims 2-3 and 11-12 are anticipated in that Ely discloses a memory device for storing parameter in a storage location. Applicants respectfully traverse this rejection and submit that Ely does not teach a memory device for storing parameter in a storage location. Claims 2 and 3 depend from the independent claim 1. As discussed above, claim 1 is allowable over Ely. Accordingly, claims 2 and 3 are also allowable as being dependent upon an allowable base claim.

Claims 11 and 12 depend from the independent claim 10. As discussed above, claim10 is allowable over Ely. Accordingly, claims 11 and 12 are also allowable as being dependent upon an allowable base claim.

Rejections Under 35 U.S.C. § 103(a)

Claims 1-7, 10-18, 22-23, 26-31, 33-39 and 43-44 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,870,139 to Cooper et al. (hereinafter Cooper). The Applicants respectfully traverse this rejection.

In the *Response to Remarks* of the Office Action, the Applicants are again reminded that the 35 USC §103 rejections are based on combinations of references and that one cannot show nonobviousness by attacking references individually where the rejections are based on combinations of references. The Applicants respectfully submit that the rejection of claims 1-7, 10-18, 22-23, 26-31 33-39 and 43-44 are rejected under 35 U.S.C. 103(e) as being unpatentable over **ONLY** Cooper. **No combination of references is asserted within the Office Action or any previous Office Action for the obviousness rejection of claims 1-7, 10-18, 22-23, 26-31, 33-39 and 43-44. The obviousness rejection of the above-listed claims is in view of Cooper only and not a combination of references.** Therefore, Applicants respectfully resubmit their previous arguments against Cooper below.

Cooper teaches a plurality of video cameras each sending a video signal and an audio signal to a video controller. Each of the video cameras receive a vertical drive signal and a

horizontal drive signal from the video controller. A sensor interface sends sensor signals to the video controller. The video controller sends camera status signals to camera status indicators which indicate which of the video cameras are active. The video controller determines which of the video cameras are active, selects the video signals from one of the plurality of cameras, inserts a camera number code into the selected video signals which corresponds to the selected video camera, inserts indicator symbology into the selected video signals which represent the information from the status interface, and sends the selected video having the camera number code and the indicator symbology to a video recorder. [Cooper, Abstract]

As recognized within the Office Action, Cooper does not teach that the video decoder is not coupled to a selector to receive a selected video signal. However, it is concluded within the Office Action that it would have been obvious to a person of ordinary skill in the art to couple the video decoder to a selector for receiving a selected video signal in order to decode/encode the selected video signal. The Applicants respectfully disagree with this conclusion. There is no hint, teaching or suggestion in Cooper to couple the video decoder to a selector for receiving a selected video signal in order to decode/encode the selected video signal.

Further, because the Applicants submit that Cooper does not even disclose a controller coupled to the video decoder for conditioning the video decoder according to a parameter, and initializing and obtaining an initial value upon a start up during a first cycle wherein a video frame is captured from each camera, the Applicants submit that even if the structure of Cooper included a video decoder coupled to the selector as proposed by the Examiner, the result would necessarily constitute a structure different from that of the Applicants, and one that would not accomplish the result of the claimed invention in that the cited reference does not include a video decoder coupled to the selector **and** a controller.

In contrast to the teachings of Cooper, the present invention includes a video decoder coupled to a selector. Also, the present invention includes a controller coupled to the video decoder for conditioning the video decoder according to a parameter, and initializing and obtaining an initial value upon a start up during a first cycle wherein a video frame is captured from each camera. The Office Action rejects claims as obvious in view of Cooper alone. Nowhere is it stated where the missing elements can be learned, nor where the motivation is provided to make such a combination.

The independent claim 1 is directed to an apparatus for receiving video signals from a plurality of video cameras. The apparatus of claim 1 includes a selector having a plurality of

inputs wherein each input receives one of a plurality of video signals, a video decoder coupled to an output of the selector wherein the video decoder receives a selected one of the plurality of video signals and a controller coupled to the video decoder wherein the controller conditions the video decoder according to a parameter representative of the selected one of the video signals. As described above, Cooper does not teach or make obvious the video decoder couple to the selector or a controller coupled to the video decoder wherein the controller conditions the video decoder according to a parameter representative of the selected one of the video signals. For at least these reasons, the independent claim 1 is allowable over the teachings of Cooper.

Claims 2-7 are dependent upon the independent claim 1. As discussed above, the independent claim 1 is allowable over the teachings of Cooper. Accordingly, claims 2-7 are also allowable as being dependent upon an allowable base claim.

The independent claim 10 is directed to an apparatus for receiving video signals from a plurality of video cameras. The apparatus of claim 10 includes a selector having a plurality of inputs wherein each input receives one of a plurality of video signals, a video decoder coupled to an output of the selector wherein the video decoder receives a selected one of the plurality of video signals and a controller coupled to the video decoder wherein the controller conditions the video decoder according to a plurality of parameters representative of the selected one of the video signals. As described above, Cooper does not teach or make obvious the video decoder couple to the selector or a controller coupled to the video decoder wherein the controller conditions the video decoder according to a parameter representative of the selected one of the video signals. For at least these reasons, the independent claim 10 is allowable over the teachings of Cooper.

Claims 11-18 and 22-23 are dependent upon the independent claim 10. As discussed above, the independent claim 10 is allowable over the teachings of Cooper. Accordingly, claims 11-18 and 22-23 are also allowable as being dependent upon an allowable base claim.

The independent claim 26 is directed to a method of receiving video signals from a plurality of video cameras. The method of claim 26 has been amended to include selecting one of the plurality of video cameras for providing a video signal to a video decoder, retrieving a parameter representative of the video signal from a memory store, conditioning the video decoder according to the parameter and updating the parameter according to the video signal thereby forming an updated parameter and a predicted value for the parameter, wherein forming the predicted value for the parameter includes calculating a difference between prior value obtained for the parameter and a current value obtained for the parameter and combining the

difference with the current value. Within the Office Action, claim 32 has been objected to as being dependent upon a rejected base claim 26, but would be allowable: if claim 32 were rewritten in independent form including all of the limitations of the base claim 26 and any intervening claims. The Applicants have amended claim 26 to include the limitations of claims 30-32, i.e., all intervening claims. For at least these reasons, the independent claim 26 is allowable over the teachings of Cooper.

Claims 27-29, 33-39 and 43-44 are dependent upon the independent claim 26. As discussed above, the independent claim 26 is allowable over the teachings of Cooper. Accordingly, claims 27-29, 33-39 and 43-44 are also allowable as being dependent upon an allowable base claim.

Claims 8-9 and 24-25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Cooper as applied to claims 1 and 10 above, respectively, and in further view of U.S. Patent No. 5,436,659 to Vincent (hereinafter Vincent). The Applicants respectfully traverse this rejection. Claims 8 and 9 depend from the independent claim 1. As discussed above, claim 1 is allowable over Cooper. Accordingly, claims 8 and 9 are also allowable as being dependent upon an allowable base claim.

Claims 24 and 25 depend from the independent claim 10. As discussed above, claim 10 is allowable over Cooper. Accordingly, claims 24 and 25 are also allowable as being dependent upon an allowable base claim.

Claims 19-21 and 40-42 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Cooper as applied to claims 10 and 26 above, respectively, and in further view of U.S. Patent No. 4,167,021 to Holmes (hereinafter Holmes). The Applicants respectfully traverse this rejection. Claims 19-21 depend from the independent claim 10. As discussed above, claim 10 is allowable over Cooper. Accordingly, claims 19-21 are also allowable as being dependent upon an allowable base claim.

Claims 40-42 depend from the independent claim 26. As discussed above, claim 26 is allowable over Cooper. Accordingly, claims 40-42 are also allowable as being dependent upon an allowable base claim. Furthermore, the Applicants respectfully submit that Holmes issued more than twenty years ago. Therefore, the combination of Cooper and Holmes asserted in the Office Action would not be obvious to anyone working in the art, or they would have long since made the proposed combination.

Furthermore, claims 30 and 31 have been canceled.

For these reasons, Applicants respectfully submit that all of the claims are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, they are encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,
HAVERSTOCK & OWENS LLP

Dated: 12-1-03

By: Thomas B. Haverstock
Thomas B. Haverstock
Reg. No. 32,571
Attorneys for Applicant(s)